

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re:	)	
	)	
Michael A. Wolf,	)	
	)	
Debtor.	)	No. 19 C 1978
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	)	
N. Neville Reid, not individually,	)	
but solely in his capacity as Chapter 7	)	Judge John J. Tharp, Jr.
Trustee for the bankruptcy estate of	)	
Michael A. Wolf	)	
	)	(Bankruptcy Case No. 14 B 27066)
Plaintiff,	)	
v.	)	
	)	
MMQB, Inc., Michael Wolf,	)	
Scott Wolf, et al.	)	
	)	
Defendants.	)	

**TRUSTEE'S MOTION FOR LEAVE TO FILE EXHIBIT UNDER SEAL**

Pursuant to N.D. Ill. L.R. 5.8 and 26.2, the judgment creditor plaintiff, N. Neville Reid, not individually but solely in his capacity as the trustee of the bankruptcy estate of Michael A. Wolf (the "Trustee"), hereby moves to file under seal an exhibit to its Renewed Motion To Compel Michael Wolf To Turnover And Deliver Assets And Proceeds Or Alternatively For Entry Of A Judgment Against Him And For Other Relief, filed contemporaneously herewith:

1. Exhibit 11 of Trustee's Renewed Motion To Compel Michael Wolf To Turnover And Deliver Assets And Proceeds Or Alternatively For Entry Of A Judgment Against Him And For Other Relief are the financial records produced by Michael Wolf, a third party citation respondent.
2. Exhibit 11 consists of 348 pages of bank records and tax returns which include social security numbers, financial account numbers, home addresses, and related information.

3. The party that produced the documents which comprise Exhibit 11, Michael Wolf, produced the documents without any redaction.

4. Counsel for the Trustee is able redact: (a) the social security number of Mr. Wolf to the last four digits; (b) the account number for the one personal financial account of Mr. Wolf which he produced to the last four digits; (c) Mr. Wolf's date of birth to the year; and (d) Mr. Wolf's home address to the city and state.

5. If Mr. Wolf seeks to redact any other information, the Trustee requests that Mr. Wolf be given seven (7) days to file his redacted version of Exhibit 11.

6. Otherwise, the Trustee requests that the Trustee be given leave to file a redacted version of Exhibit 11 which redacts *only*: (a) the social security number of Mr. Wolf to the last four digits; (b) the account number for the one personal financial account of Mr. Wolf which he produced to the last four digits; (c) Mr. Wolf's date of birth to the year; and (d) Mr. Wolf's home address to the city and state.

Wherefore, the Trustee requests: (1) leave to provisionally file Exhibit 11 under seal in its entirety; (2) Michael Wolf be ordered to file a redacted version of Exhibit 11 within 7 days if he wishes to do so; and (3) if Mr. Wolf fails to file a redacted version of Exhibit 11 within 7 days, the Trustee be given leave to file a redacted version of Exhibit 11 which redacts *only*: (a) the social security number of Mr. Wolf to the last four digits; (b) the account number for the one personal financial account of Mr. Wolf which he produced to the last four digits; (c) Mr. Wolf's date of birth to the year; and (d) Mr. Wolf's home address to the city and state.

Dated: December 31, 2024

Respectfully Submitted,

N. Neville Reid, not individually, but solely  
in his capacity as chapter 7 trustee for the  
bankruptcy estate of Michael A. Wolf,

/s/ Daniel P. Dawson

One of his attorneys

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**CERTIFICATE OF SERVICE**

I, Daniel P. Dawson, certify that on December 31, 2024, I caused a copy of the foregoing to be filed electronically through the Court's CM/ECF filing system which will cause the document to be served upon all parties electronically through the Court's CM/ECF filing system, and also served additional parties as listed on the attached Service List as indicated.

/s/ Daniel P. Dawson

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**SERVICE LIST**

*Via ECF Service*

U.S. Bankruptcy Court, Clerk	<u><a href="mailto:ilnb.appeals@ilnb.usCourts.gov">ilnb.appeals@ilnb.usCourts.gov</a></u>
United States Trustee	<u><a href="mailto:pat.s.layng@usdoj.gov">pat.s.layng@usdoj.gov</a></u>
Scott Wolf	<u><a href="mailto:scottwolf.0330@gmail.com">scottwolf.0330@gmail.com</a></u>

*Via Federal Express*

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